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May 16 2016

Mr Gary Miller Remedial Project Manager
U S Environmental Protection Agency Region 6
Superfund Division (6SF RA)
1445 Ross Avenue Suite 1200
Dallas Texas 75202 2733

Re San Jacinto River Waste Pits Superfund Site

Monthly Progress Report No 78 April 2016/May 2016

U S EPA Region 6 CERCLA Docket No 06 03 10 UAO for RI/FS

Project Number 150557 01

Dear Mr Miller

Attached please find the Monthly Progress Report No 78 for April 2016/May 2016 This report was prepared on behalf of the International Paper Company and McGinnes Industrial Maintenance Corporation for the San Jacinto River Waste Pits Superfund Site in Channelview Texas Should you have any questions please contact me at (228) 818 9626 or email me at <a href="mailto:dkeith@anchorqea.com">dkeith@anchorqea.com</a>

Sincerely

David C Kind

David C Keith

**Project Coordinator** 

cc Steve Tzhone USEPA Anne Foster USEPA

9688706

## Monthly Progress Report No. 78 April 2016/May 2016 Submitted May 16, 2016

# San Jacinto River Waste Pits Superfund Site USEPA Region 6, CERCLA Docket No. 06-03-10 UAO for RI/FS Channelview, Texas

The Unilateral Administrative Order (UAO) for the Remedial Investigation/Feasibility Study (RI/FS) at the San Jacinto River Waste Pits Superfund Site (Site) in Channelview, Texas, (USEPA Region 6, CERCLA Docket No. 06-03-10 UAO for RI/FS) was issued on November 20, 2009. The Respondents include International Paper Company (IP) and McGinnes Industrial Maintenance Corporation (MIMC).

#### A. Summary of Work Performed – April 2016/May 2016

The Respondents, Anchor QEA, and Integral Consulting completed work on the following tasks:

- Submitted Monthly Progress Report No. 77 to the United States Environmental Protection Agency (USEPA) on April 15, 2016.
- Continued to coordinate with USEPA on its review of alternatives presented in the Draft Final Interim Feasibility Study (FS).
- Conducted fish tissue and sediment sampling May 4, 2016 May 10, 2016.
- Completed access improvements and installed Monitoring Well SJMW013 the week of May 9, 2016.
- Coordinated with Gary Miller by phone and email on May 10, 2016, regarding providing support items for USEPA's community meeting scheduled for May 25, 2016.
- Received email from Gary Miller on May 11, 2016, concerning National Remedy Review Board (NRRB) meeting date of June 15, 2016, and submittal date of May 20, 2016 for white papers on site remedy selection issues. Coordinated with USEPA on National Remedy Review Board submittals process.
- Coordinated with USEPA on field sampling and analysis schedules for sediment, tissue, groundwater, porewater and surface water, and submitted an updated draft schedule for those efforts to USEPA on May 12, 2016.
- Submitted a memorandum on Performance Reference Compound analysis procedures for porewater and groundwater sampling and analysis plans for USEPA review and approval on May 12, 2016.
- Received an email from Gary Miller on May 9, 2016 requesting assistance in locating a table from Appendix E of the Baseline Human Health Risk Assessment (BHHRA), and responded with the table location in the BHHRA on May 11, 2016.

## Monthly Progress Report No. 78 April 2016/May 2016 Submitted May 16, 2016

# San Jacinto River Waste Pits Superfund Site USEPA Region 6, CERCLA Docket No. 06-03-10 UAO for RI/FS Channelview, Texas

### **B. Summary of Agency Communications**

The written communications between Respondents and USEPA subsequent to the issuance of the UAO are summarized in the attached Table 1.

#### C. Summary of Sampling Results

No additional data have been collected or reported.

#### D. Problems, Delays, and Solutions

#### San Jacinto River Fleet Operations (SJRF)

As summarized in previous monthly reports for the RI/FS, the Respondents continue to be concerned about the potential impacts of the SJRF operations in the immediate vicinity of the Site. On January 2, 2013, Respondents submitted their comments on the Revised SJRF Draft Sampling and Analysis Plan via email to USEPA. The Respondents will continue to work with USEPA on this issue. Respondents will also continue to work with USEPA and SJRF, if necessary, should there be a need for access to the SJRF property for purposes of RI/FS activities. Those discussions would be based on prior communications in that regard, which are described in the monthly reports submitted under the Administrative Settlement Agreement and Order on Consent for Removal Action for the Site.

#### **USEPA Dive Team Inspection and Porewater Sampling**

The USEPA Dive Team was scheduled to complete its inspection of the armored cap installed as part of the Time Critical Removal Action at the Site, and then install porewater samplers following the inspection during the week of April 4, 2016. The USEPA Dive Team was at the Site through April 8, 2016, but did not complete the inspection of the armored cap, or installation of the porewater samplers. USEPA is scheduled to complete the cap inspection and install the porewater samplers the week of May 16, 2016. The Respondents will provide support required for the completion of the dive team inspection and porewater sampler installation.

#### E. Projected Work for Next Two Reporting Periods - May 2016/July 2016

The Respondents, Anchor QEA, and Integral Consulting expect to conduct the following tasks during the remainder of May 2016 through July 2016:

## Monthly Progress Report No. 78 April 2016/May 2016 Submitted May 16, 2016

# San Jacinto River Waste Pits Superfund Site USEPA Region 6, CERCLA Docket No. 06-03-10 UAO for RI/FS Channelview, Texas

- Continue to participate in and support USEPA on community awareness and outreach issues.
- Continue to work with USEPA and SJRF, if necessary, on issues associated with SJRF's potential impacts on the Site.
- Continue, in light of USEPA's decision to assume responsibility for the FS (as
  communicated by USEPA's Remedial Project Manager to Respondent's Project
  Coordinator in a phone call on April 5, 2016), to address any questions and comments of
  USEPA regarding the Draft Final Interim FS as they arise and to support USEPA as
  needed as it finalizes the FS.
- Proceed with field work on groundwater, porewater, surface water, sediment, and tissue SAPs.
- Prepare an updated NRRB submittal prior to the final due date provided by USEPA.

#### F. Schedule

The Draft Final Interim FS was submitted to USEPA on March 21, 2014, and reviews of the Draft Final Interim FS by USEPA and the USACE have been ongoing.

On August 6, 2015, USEPA directed the Respondents to revise the Final RI/FS Work Plan, dated November 2010, or to prepare addenda to the Work Plan. On September 30, 2015, the Respondents provided USEPA with a schedule for completing sampling and analysis plans (SAPs) and conducting associated field work, data analysis and reporting to fulfill USEPA's directive. The USEPA approved the schedule for submittal of Draft SAPs relating to the future sampling at the Site on October 8, 2015. Porewater and sediment SAPs were submitted on October 23, 2015, and groundwater and surface water SAPs were submitted on November 20, 2015. The Respondents have subsequently revised the SAPs in response to USEPA comments, and the revised SAPs have been approved by USEPA. The completion of the work required by the SAPs depends upon timing for completion of the USEPA Dive Team inspection and porewater sampler installation. The USEPA Dive Team is scheduled to complete their armored cap inspection and porewater sampler installation the week of May 16, 2016. The attached schedule provides milestones related to the sampling and analysis plans implementation, data analysis and reporting based on what is known to date. This schedule was provided to USEPA for review on May 12, 2016. The proposed schedule contains deadlines that may require adjustment as a result of conditions encountered during field work, the timing of responses and approvals on the part of USEPA and other circumstances.

# Monthly Progress Report No. 78 April 2016/May 2016 Submitted May 16, 2016 San Jacinto River Waste Pits Superfund Site USEPA Region 6, CERCLA Docket No. 06-03-10 UAO for RI/FS Channelview, Texas

On April 5, 2016, USEPA Remedial Project Manager notified Respondent's Project Coordinator that USEPA would be finalizing the FS for the Site. The final RI/FS schedule will depend on completion of the work associated with the SAPs, and USEPA's completion of the FS.

Prepared by:
David C. Keith
Project Coordinator

Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
12/4/2009	Required Notifications pursuant to Paragraphs 51 and 75 of UAO	None	NA -	Provided notice of intent to comply and "sufficient cause" defenses and identified Project_ Coordinator
12/7/2009	Copies of Letters to McGinnes Heirs Regarding Site	None	NA	
12/10/2009	Draft Scoping Meeting Minutes	None	NA	1
12/14/2009	Copy of Response from Big Star Barge & Boat Company Regarding Site Access	None	NA	
12/15/2009	- Monthly Progress Report No 1-	None -	NA .	1 - 3
12/18/2009	Status Report on Site Access	1/12/2010	Actions to date did not constitute "best efforts" to gain access	Respondents and EPA spoke regarding the matter in further detail on 1/8/10
12/21/2009	HASP	None	NA · · · ·	
12/21/2009	Anchor QMP	None , ,	~ NA1	1
12/21/2009	Integral QMP	None	NA -	
1/7/2010	Request for comments regarding access agreement for Big Star Barge & Boat Company	None	NA .	-
1/11/2010	Proposed Draft AOC for time critical removal action	1/12/2010	Respondents' proposed AOC has been forwarded to headquarters and Philip Allen for comment Time critical removal action requires imminent and substantial endangerment finding	
1/12/2010	Copy of Consent Form for Site Access from Big Star Barge & Boat Company	None	NA	
1/12/2010 -	Notice of UAO Deficiency	None _	Actions to date did not constitute "best efforts" to gain access	
1/13/2010	Draft Sediment Sampling and Analysis Plan Minutes	None	NA	
1/13/2010	Draft Database and Data Exchange Minutes	None	NA	
1/15/2010	Monthly Progress Report No 2	None ·	NA -	
1/15/2010	Update Regarding Respondents' Efforts to Obtain Access Agreement, Response to Letter from Barbara Nann and Request-for Extension	1/21/2010	Efforts to obtain Site access are "encouraging "	
1/20/2010	Correspondence from Port of Houston Authority regarding access	None	NA	٠, ,
1/21/2010 -	Copies of Site Access Letter From Attorney for McGinnes Heirs	1/22/2010	EPA requested another copy of the letter	,

Respondents ! Submittal ! Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
1/21/2010 -	Correspondence with Port of Houston Authority Regarding revised fence alignment	Nońe	NA	
1/22/2010	Copies of Site Access Letter From Attorney for McGinnes Heirs	None	NA	
1/25/2010	Copies of Letters Sent to Gary Gladfelter and Tanya Ammons Regarding Site Access	None	NA	
1/27/2010	Draft 1/20/10 Alignment Meeting Minutes	None	NA ·	
1/27/2010	Copy of Correspondence with Big Star Barge & Boat Company Regarding Site Access	None	NA .	5 - 1-1-1 - 1 - 1
1/27/2010	EPA's response to Respondents' proposed AOC regarding Time Critical Removal Action	None	EPA will give Respondents additional time to respond as to whether Group wants to enter into AOC for Site stabilization	· - ,
1/29/2010	Copy of Revised Consent Form for Site Access from Big Star Barge & Boat Company	None	NA -	
2/2/2010	Copy of Correspondence with Big Star Barge & Boat Company Regarding Site Access	None	NA ·	
2/4/2010	Respondents' proposed changes/comments on proposed AOC for Time Critical Removal Action	3/5/2010 —	Awaiting finalization of action memo for site stabilization before making additional changes to the AOC for site stabilization.	
2/10/2010	Draft Memorandum San Jacinto River Waste Pits Superfund Site Time Critical Removal Action	Non	NA	
2/11/2010	Copy of Revised Consent Form for Site Access from Big Star Barge & Boat Company	None	NA	
2/11/2010	Copy of executed Consent Form for Site Access from Big Star Barge & Boat Company	2/17/2010	EPA approved of the form and will await an access agreement allowing for the RI/FS to take place	-
2/15/2010	Monthly Progress Report No 3	None	NA	
2/16/2010	Draft Sediment Sampling and Analysis Plan/QAPP	None	Comments received March 10, 2010	
2/16/2010	Correspondence to EPA regarding update to Respondents' efforts to obtain access to the site	None	NA .	
2/17/2010	Submitted the Agency Review Draft of the Quality Assurance Project Plan and Field Sampling Plan for Sediment Sampling	Consolidated comments received on March 10, 2010	Follow up meeting conducted with EPA, TCEQ and Trustees on March 16 and comment/response table developed for submittal with Draft Final report	Draft Final document submitted on 4/9/2010.

Respondents - Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
2/18/2010	Sampling Plan for sediment sampling on February 17, 2010	2/19/2010	EPA will forward for review to EPA's financial assurance expert	
2/18/2010	Correspondence from MIMC regarding financial assurance bond	2/19/2010	EPA will forward for review to EPA's financial assurance expert	
2/19/2010~	Copy of presentation regarding Short-Term Communications Plan	None	NA	-
2/22/2010	Letter to Barbara Nann regarding MIMC's responsibility to provide access to the V C McGinnes, Trustee tract	None -	NA	- J.,
3/18/2010	Draft Sediment Sampling and Analysis Plan Comment Review Meeting Minutes March 16, 2010, TCEQ, Austin Texas	None	NA	
4/7/2010	Draft Field Sampling Plan and Job Safety Analyses for the TCRA sampling	None _	NA	This sampling was requested by EPA in an email on March 26, 2010
4/9/2010	Submitted the Draft RI/FS Work Plan and SLERA	June 3, 1010	Comments received from EPA by email	<u> </u>
4/9/2010	Submitted the Draft Final of the Quality Assurance Project Plan and Field Sampling Plan for sediment sampling	None	NA	- /
4/15/2010	Submitted Monthly Progress Report No 5 on April 15, 2010	None	NA .	
,		4/26/2010	Approval letter from EPA for implementation of the RI/FS Sediment QAPP/SAP.	Agency requested replacement pages for Final QAPP/SAP
4/30/2010_	Submitted replacement pages to EPA, TCEQ and the trustees for the Final SAP/QAPP on April 30, 2010	None	NA .	·
5/11/2010	Submitted the Draft Chemical Fate and Transport Modeling Study design and sampling and analysis plan addendum on May 11	None	NA	
5/14/2010	Submitted a Soil Sampling and Analysis Plan for the TxDOT right-of-way to TxDOT and EPA	None	NA	Submitted to TxDOT as part of effort to obtain access into the TxDOT right-of-way for RI/FS and TCRA activities

Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
5/17/2010	Submitted Monthly Progress Report No 6 on May 17, 2010	None		
5/21/2010	Submitted revised TxDOT right-of-way sampling and analysis plan	None	,	Comments received from TxDOT on May 25, 2010
5/25/2010	Submitted email outlining sediment sampling and analysis deviations	5/26/2010	EPA agreed to recommendations and asked that human health locations on west bank be reconsidered	Human health locations on west bank moved with EPA concurrence in email on May 28, 2010
5/27/2010	Submitted revised TxDOT right-of-way sampling and analysis plan	None		TxDOT approved the revised sampling and analysis plan on June 11, 2010
5/28/2010	Submitted email summary of VOC data from sediment sampling	5/28/2010	EPA concurred that no further VOC analyses were required	- '
6/7/2010	Response to 6/4/10 email from Barbara Nann regarding access for 3 soil samples in western impoundment	None	-	-
6/11/2010	Submitted Draft Tissue Sampling and Analysis Plan and Draft Technical Memorandum on Bioaccumulation Modeling on June 11, 2010	None		
6/1 <b>5/2</b> 010	Submitted Monthly Progress Report No 7 on June 15, 2010	None		
6/25/2010	Submitted comments and responses on Draft RI/FS Work Plan	None		1
7/9/2010	Submitted Revised Draft RI/FS Work Plan	7/12/2010 8/26/2010	Email from B Nann forwarding edits to RI/FS work plan Email from Steve Tzhone with additional comments concerning Site History and soil sampling in the area of former impoundments south of I-10	
7/15/2010	Submitted Monthly Progress Report No 8 on July 15, 2010	None		~

Respondents ' Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
7/27/2010	Provided EPA a draft response to comments on the Draft Fate and Transport Memorandum Review	8/12/2010	Email from S Tzhone forwarding two additional comments on the Fate and Transport Modèling Memorandum	, ,
8/16/2010	Submitted Monthly Progress Report No 9 on August 16, 2010	None		
8/17/2010	Submitted revised response to comments on the Fate and Transport Sampling and Analysis Plan	8/31/2010 <sup>-</sup> 9/7/2010	Email from S Tzhone approving the revised response to comments and authorizing submittal of the Final Draft document.  Email from S Tzhone providing comments from USGS on sampling and analysis plan and direction to incorporate comments as EPA comments by phone Comments need to be addressed prior to implementing field work	-
8/18/2010	Submitted Draft Addendum to the Sampling and Analysis Plan (SAP) Sediment Study	8/23/2010	Email from S Tzhone approving the addendum SAP and authorizing sampling in Cedar Bayou	-
8/18/2010	Submitted revised response to comments on the Bioaccumulation Modeling and Tissue Sampling and Analysis Plan	8/31/2010	Email from S Tzhone approving the revised response to comments and authorizing submittal of the Final Draft documents	
8/19/2010	Submitted Draft Meeting Minutes - Agency Comments on Tissue SAP and Technical Memorandum on Bioaccumulation Modeling	None		
9/3/2010	Submitted Draft Final RI/FS Work Plan	10/7/2010	Letter of deficiency from S Tzhone requiring Respondents to incorporate EPA's Comment Number 4 (sampling of south impoundment) provided to the respondents on August 26; 2010, as part of the RI/FS	Respondents have 14 days to comply from the date of the letter

	ver, Waste Pits Superfund Site	i	·	<u>, / </u>
Respondents Submittal Date	Respondents' Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
9/9/2010	Submitted letter to Steve Tzhone regarding Site Warning and Protective Measures	9/1/2010	Email from S. Tzhone approving the proposed scope of work for additional fencing and signs and requesting clarification and final design for impoundment signs and buoy placement.	
9/10/2010	Submitted letter to Steve Tzhone and Barbara Nann-concerning MIMC's participation in soil sampling in the area of former impoundment south of I-10	10/8/2010	Letter to MIMC counsel from B Nann expressing disagreement with MIMC's letter and reiterating position that south impoundment must be sampled	-
9/10/2010	Submitted the Draft Soil Sampling and Analysis Plan for the RI/FS	None		
9/10/2010	Submitted Draft Final Tissue SAP, and Draft Final Technical Memorandum on Bioaccumulation Modeling	,	-	, ,
9/15/2010.	Submitted Monthly Progress Report No 10 on September 15, 2010	10/7/2010	Letter of deficiency from S Tzhone requiring Respondents to submit all raw data with monthly progress reports	Respondents have 14 days to comply from the date of the letter
9/16/2010	Submitted letter outlining proposed buoy and warning signs at impoundments	9/16/2010	Email from S Tzhone approving final design for signs and buoy system	

Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
9/23/2010	Submitted an email with clarifications required for the final Sampling and Analysis Plan Tissue Study on the following topics Laboratory Certification, selection of tissue analytes, and a few editorial changes to the tables and text re. lipid analysis methods.	9/24/2010	Email from Steve Tzhone indicating that EPA agreed with the response to EPA's concerns about laboratory certification, and agreeing to the proposed edits. EPA approved the final Tissue SAP and Technical Memorandum on Bioaccumulation Mödeling on September 24, 2010	
9/28/2010	Submitted Final Sampling and Analysis Plan. Tissue Study and Final Technical Memorandum on Bioaccumulation Modeling on September 28, 2010	9/29/2010	EPA approved of the Tissue SAP Addendum	,
9/30/2010	Submitted Draft TxDOT Right-Of-Way Data Report on September 30, 2010	None	~	
10/1/2010	Submitted Draft Groundwater QAPP and FSP on October 1, 2010	None	1	
		10/7/2010	Email from B Nann regarding status of access efforts	
		10/11/2010	Email from B Nann encouraging diligent efforts on access	
10/13/2010	Email to B Nann regarding the status of access efforts and need for a conference call between TxDOT, EPA and respondents to discuss	10/14/2010′	Email from B Nann agreeing to conference call	
10/15/2010	Submitted Monthly Progress Report No. 11 on October 15, 2010			,
10/18/2010	IP Letter responding to NOD regarding south area investigation			

Respondents Submittal Date /	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
10/20/2010	Submitted revised monthly reports for June, July,—August, and September 2010 and accompanying raw data on discs		-	, +
10/21/2010	MIMC letter responding to NOD regarding south area investigation		5	
10/21/2010	Joint letter responding to NOD regarding raw data			
10/21/2010	Submitted Draft Final RI/FS Work Plan	11/2/2010	Draft Final RI/FS Work Plan approval letter from S. Tzhone provided by email	-
	_	10/25/2010	Email from B Nann approving use of TxDOT right-of-way for gravel road	
i		10/29/2010	Received certified letter from B Nann regarding UAO deliverables	
11/1/2010	Certified letter to B Nann from IP counsel detailing Respondents' efforts to obtain Site Access Agreements with TxDOT and Big Star Barge and Boat			
		11/2/2010	Received certified letter from B Nann regarding best efforts for obtaining Site Access	
		11/3/2010	Email from S Tzhone to D Keith expressing concerns with field sampling procedures used during the week of October 25, 2010	

Summary of Agency Communication

San Jacinto River Waste Pits Superfund Site

Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
11/5/2010	Email from D Keith to S Tzhone regarding compliance with UAO deliverable procedures and proposed future deliverable procedures	11/5/2010	Email from S Tzhone to D Keith concurring with proposed procedures	-
	r	11/8/2010	Email from B. Nann concurring with proposed procedures	
11/8/2010	Email from D Keith to S Tzhone concerning revisions to field procedures to be used in the future			
11/8/2010	Re-submitted Revised Draft Groundwater Study SAP	11/22/2010	Email from S -Tzhone with comments on Groundwater SAP	
11/8/2010	Re-submitted Draft Soil Sampling and Analysis Plan	11/22/2010	Email from S Tzhone with comments on Soil SAP	Additional comments received from S Tzhone or 11/30/2010
11/12/2010	Certified letter to B Nann from Al Axe reiterating and detailing Respondents' efforts to obtain Site Access Agreements with TxDOT and Big Star Barge and Boat			
11/15/2010	Submitted Monthly Progress Report No 12 on November 15, 2010	-	-	
11/30/2010	Submitted Draft Final Comment/Response Matrix of the Fate and Transport Modeling Memorandum	12/8/2010	Email from S Tzhone approving the Draft Final Comment/Response matrix	
11/30/2010	Transferred preliminary. Big Star soils data to USEPA as a mix of excel and PDF files via email, and then submitted the complete preliminary invalidated data to USEPA via email December 1, 2010			
12/6/2010	Submitted Draft Comment/Response Matrix for Groundwater SAP	12/14/2010	Email from S. Tzhone approving the Draft Final Comment/Response matrix	

Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
12/9/2010	Submitted Draft Comment/Response Matrix for Soil SAP	-	,	
12/15/2010	Submitted Monthly Progress Report No 13 on December 15, 2010	_		
12/16/2010	Submitted the Draft Final Groundwater Study Sampling and Analysis Plan on December 16, 2010	12/23/2010	Email and letter from S Tzhone approving the Groundwater Study Sampling and Analysis Plan	Requested final copies be provided to remove "Draft" from "Draft Final" - implementation of field work approved
12/17/2010	Submitted the Draft Final Chemical Fate and Transport Modeling Memorandum December 17, 2010	1/10/2011	Email and letter from S Tzhone approving the Chemical Fate and Transport Modeling Memorandum	Requested final copies be provided to remove "Draft" from "Draft Final"
12/17/2010	Submitted an Addendum to the Soil SAP to describe a soil investigation in the area South of I-10 on December 17, 2010	1/18/2011 2/3/11	Emailed letter from S Tzhone providing comments to the Draft Addendum to the Soil SAP Additional comments from TCEQ on Draft Addendum to the Soil SAP received from S Tzhone by email	Conference calls to discuss comments with agencies on January 25 and February 7
12/22/2010	Submitted the Draft Final Sampling and Analysis Plan Soil Study on December 22, 2010	1/10/2011	Email and letter from S Tzhone approving the Sampling and Analysis Plan Soil Study	Requested final copies be provided to remove "Draft" from "Draft Final"
1/13/2011	Submitted Final Groundwater Study Sampling and Analysis Plan			
1/13/2011	Submitted Final Chemical Fate and Transport Modeling Memorandum		-	
1/14/2011	Submitted the Final Sampling and Analysis Plan Soil Study			- `
1/14/2011	Submitted Monthly Progress Report No 14	-		
1/24/2011	Email from D Keith to S Tzhone regarding schedule for soil sampling activities			-
1/27/2011	Letter from IPs counsel submitted to USEPA regarding International Papers efforts to obtain access for the south area investigation			

Table 1
Summary of Agency Communication

San Jacinto Ri	San Jacinto River Waste Pits Superfund Site					
Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Nòtés		
1/27/2011	Provided USEPA a compilation of historical aerial photographs of the project area on the project web portal	` -		- ,		
2/1/2011	Submitted a DVD containing all draft documents for the SJRWP RI/FS submitted to USEPA via the project portal through January 25; 2011		· · · · · · · · · · · · · · · · · · ·	, 1		
2/11/2011	Submitted Draft Contaminants of Potential Concern Memorandum	3/10/2011	Received comments on Draft COPC Technical Memorandum			
2/14/2011	Submitted Draft Revised RI/FS Schedule	2/15/2011	Approval letter from EPA-for revised RI/FS schedule	1		
2/15/2011	Submitted Monthly Progress Report No 15	* 1	'	~		
2/15/2011	Submitted the Draft Bed Property Study Field Sampling Plan	3/3/2011	Received emailed comments from S Tzhone on Draft Bed Property Study FSP			
2/15/2011	Submitted the Draft Bathymetry Survey Field Sampling Plan	3/3/2011	Received emailed comments from S Tzhone on Draft Bathymetry Survey FSP	- 1- 1- 1- 1- 1- 1- 1- 1- 1- 1- 1- 1- 1-		
2/22/2011	Submitted Draft Final Sampling and Analysis Play, Soil Study Addendum 1	3/4/2011	Approval letter from USEPA for Draft Final Sampling and Analysis Play, Soil Study Addendum 1			
3/2/2011	Submitted Draft Current Velocity Study Field Sampling Plan		•	٠. ي		
3/8/2011	Submitted Draft Comment Response Matrices for the Draft Bed Property Study and Draft Bathymetry Survey FSPs	3/9/2011 	Phone conversation with Steve Tzhone indicated that responses were approved			
3/9/2011	Submitted Final Sampling and Analysis Plan, Soil. Study Addendum 1	-		·		
- 3/11/2011	Phone call from J Sampson (proxy for D Keith) to S. Tzhone to report field observations of a petroleum odor and oily sheen on some subsurface soil samples from the south impoundment soil study area	3/11/2011	Received an email from S Tzhone acknowledging the phone report, and with direction to: 1) proceed with sampling according to the approved Soil SAP Addendum 1, and 2) to provide a summary report of field observations when the sampling event is complete	· · · · · · · · · · · · · · · · · · ·		
3/15/2011	Submitted Monthly Progress Report No 16	1				

Summary of Agency Communication

San Jacinto River Waste Pits Superfund Site

	iver Waste Pits Superfund Site		1	
Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
3/15/2011	Submitted the Draft Final Bed Property Study and the Draft Final Bathymetric Survey Field Sampling Plans	3/21/2011	Approval letter from USEPA for Draft Final Bed Property Study and the Draft Final Bathymetric Study FSP	
3/16/2011	Submitted the Draft Sedflume Study FSP, the Draft Radioisotope Coring Study FSP, and the Draft Upstream Sediment Load Study FSP	4/8/2011	Received emailed comments from S Tzhone on the Draft Sedflume Study FSP, the Draft Radioisotope Coring Study FSP, and the Draft Upstream Sediment Load Study FSP	Conference call to discuss comments with agencies on April 15, 2011
3/16/2011	Submitted Field Report on south impoundment soil sampling	7	-	, , , , ,
3/18/2011	Submitted a letter to USEPA on behalf of International Paper regarding the completion of the south impoundment sampling	-		
3/25/2011	Submitted the Final Bed Property Study and the Final Bathymetric Survey Field Sampling Plans			,
3/28/2011	Submitted the Draft Comment/Response Matrix for the Draft Current Velocity Study Field Sampling Plan	4/6/2011	Received emailed comments from S Tzhone with two additional comments on the Draft Current Velocity Study FSP	
		3/29/2011	Received emailed letter from S. Tzhone requesting Respondents participate in Residential Soil Sampling as part of USEPA's Community Engagement Initiative	Respondents provided USEPA their response to this request on April 15, 2011
3/30/2011 -	Submitted the Draft Comment/Response matrix with responses to USEPA comments on the COPC Technical Memorandum	4/1/2011	Conference call with USEPA to discuss comments	
4/7/2011	Submitted an email request for assistance in obtaining Quality Assurance Project Plan and laboratory validation packages for the TCEQ Total Maximum Load programs. These documents are necessary to meet all requirements of USEPA comments on the COPC Technical Memorandum	-		
4/8/2011	Submitted Revised Comment/Response Matrix for USEPA comments on the COPC Technical Memorandum	5/5/2011	Received approval letter from Carlos Sanchez for Gary Miller on the Draft COPC Technical Memorandum	,

Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
4/8/2011	Submitted the Draft Final Current Velocity Study FSP	5/3/2011	Received approval letter from Carlos Sanchez for Gary Miller on the Draft Final Current Velocity Study Field Sampling Plan	
4/14/2011	Submitted the Draft Comments/Responses matrices for the Draft Sedflume Study, Draft Radioisotope Coring Study, and the Draft Upstream Sediment Load Study Field Sampling Plans	- 4/15/2011	Conference call with USEPA to discuss comments	
4/15/2011	Submitted Monthly Progress Report No 17		-	,
4/15/2011	Provided USEPA and TCEQ Site groundwater data maps and tables associated with implementation of the north impoundment Groundwater Field Sampling Plan	-	,	-
	-	4/19/2011	Received letter from Carlos Sanchez notifying Respondent's that USEPA has changed the designated EPA Project Coordinator under the UAO to M. Gary Miller effective April 19, 2011	
4/25/2011	Submitted Draft Final Upstream Sediment Load Field Sampling Plan	5/5/2011	Received phone request from Gary Miller to provide redline/strikeout version of Word document for EPA review	Provided redline strikeout version of document for review by email from Teri Freitas on behalf of David Keith
4/28/2011	Submitted Draft Final Radioisotope Coring Study Field Sampling Plan	5/5/2011	Received approval letter from Carlos Sanchez on behalf of Gary Miller for the Draft Final Radioisotope Coring Study Field Sampling Plan	,
	<i>'</i>	4/29/2011	Received email from Gary Miller with three additional questions on the Draft Sedflume Study Field Sampling Plan	
5/5/2011	Submitted Draft Final Sedflume Field Sampling Plan	5/20/2011	Received approval letter from USEPA on the Draft Final Sedflume Study Field Sampling Plan	

Summary of Agency Communication

San Jacinto River Waste Pits Superfund Site

Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
5/9/2011	Submitted Final Current Velocity Study Field Sampling Plan		-	
5/9/2011	Submitted Final Radioisotope Coring Study Field Sampling Plan	. , ,	-	
5/16/2011	Submitted Monthly Progress Report No 18			
	-	5/18/2011	Received approval letter from USEPA on the Draft Final Upstream Sediment Load Field Sampling Plan	
	-	5/23/2011	Received letter from Gary Miller directing Respondents sample residential soils in the area	Respondents provided USEPA their response to this request on May 31, 2011
5/24/2011	Submitted Final Upstream Sediment Load Study Field Sampling Plan			
5/24/2011	Submitted Final Sedflume Field Sampling Plan		1	• •
5/25/2011	Submitted email request to USEPA for approval to begin monitoring well decommissioning	6/2/2011	Received email approval from Gary Miller to proceed with this work in accordance with the work plan	,
5/27/2011	Submitted all Working Documents from the SJRWP Site Portal on DVD			• •
6/10/2011	Submitted Draft Soil Sampling and Analysis Plan Addendum 2	7/19/2011	Received draft approval and comments on the Draft Addendum 2 Sampling and Analysis Plan for Residential Soil Sampling	This is the sampling and analysis plan for residential soil sampling. The sampling and analysis plan was approved with modifications noted in the letter from USEPA.
6/14/2011	Posted an updated Site database to the project web portal-			1
6/15/2011	Submitted Monthly Progress Report No 19			1
7/15/2011	Submitted Monthly Progress Report No 20			
- 7/20/2011	Correspondence between MIMC counsel and USEPA regarding draft Preliminary Site Characterization Report and south impoundment issue			

Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
7/20/2011	Correspondence between International Paper counsel and USEPA regarding draft Preliminary Site Characterization Report and south impoundment issue	•		, , , , , , , , , , , , , , , , , , , ,
7/20/2011	Submitted the Draft Preliminary Site Characterization Report			-
7/21/2011	Submitted Field Sampling Report: 2010 Sediment Study			
7/21/2011	Submitted Field Sampling Report Tissue Study	•	-	
7/21/2011	Submitted Field Sampling Report 2010-2011 Soil Study			,
7/21/2011	Submitted Field Sampling Report Groundwater Study		-	,
7/22/2011	Submitted letter to USEPA regarding modeling schedule - due to drought in the Houston area	10/19/2011 ~	Received letter from Gary Miller approving change in submittal date for the Chemical Fate and Transport Modeling Study to February 1, 2012	
7/25/2011	Submitted a Final Addendum 2 to the Soil Sampling and Analysis Plan for Residential Sampling			
7/25/2011_	Provided USEPA draft language for an information sheet for residential sampling		-	
		7/29/2011	Received email, from Steve Tzhone regarding potential CenterPoint Energy pipeline planned for construction within the project area	
8/1/2011	Email from Respondents' Project Coordinator to USEPA transmitting draft consent to access for residential sampling		-	
		8/2/2011	Received copy of email prepared by USEPA counsel regarding comments on draft consent to access for residential sampling	

Table 1 Summary of Agency Communication

	ver Waste Pits Superfund Site			
Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
	-	8/2/2011	Email from A Foster to Respondents' counsel transmitting draft letters designating Respondents as EPA's representatives for Big Star access	
	-	8/3/2011	Email from A Foster to Respondents', counsel transmitting copy of letter from EPA to San Jacinto River Fleet regarding its activities at the Site, expressing intent to pursue access from Big Star/San Jacinto River Fleet, and requesting summary of Respondents' problems in obtaining access from Big Star	
	-	8/3/2011	Email from A Foster to Respondents' counsel regarding fact sheet associated with residential sampling -	. = -
<b>8/3/2011</b>	Submitted email to Gary Miller requesting change to approved Addendum 2 to the Soil Sampling and Analysis Plan. The requested revision involved a change from archiving deeper samples to including a second potential soil sampling mobilization and collection of deeper samples if required based on the results of the surface sampling. The revision was requested on the basis of a meeting between USEPA and Respondents on August 3, 2011 during which it was decided to limit the underground utility locate effort prior to mobilization for sampling so that sampling could occur sooner.	8/3/2011	Received email from Gary Miller approving proposed change to residential soil sampling and requesting a revised final soil sampling plan addendum	
8/3/2011	Email between MIMC counsel, on behalf of Respondents, and USEPA regarding revised version of consent to access for residential soil sampling			- -

	ver Waste Pits Superfund Site		T:	- ,
Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
8/3/2011	Email between MIMC counsel, on behalf of Respondents, and USEPA regarding revised version of consent to access for residential soil sampling and providing contact information for lessee of Big Star property and for Big Star counsel		-	
8/4/2011	Submitted Revised Addendum 2 to the Soil Sampling and Analysis Plan for Residential Sampling			
8/8/2011	Submitted Memorandum to Gary Miller outlining data gap issues identified in the Draft Preliminary Site Characterization Report			A meeting was held with USEPA and other agencies in Austin on August 30, 2011 to discuss these issues. A revised memorandum was submitted on September 7, 2011 based on verbal comments received from USEPA following that meeting.
	-	8/9/2011	Email from A Foster to Respondents' counsel regarding revised letter of designation	
	-	8/10/2011	Email from J Hernandez to Respondents' counsel regarding revised letter of designation	-
		8/10/2011	Received a draft letter from USEPA describing additional study in the area of the impoundment south of I-10	-
8/15/2011	Submitted Monthly Progress Report No. 21			-
8/26/2011	Submitted preliminary unvalidated residential soil sampling data to USEPA		,	Followed electronic data deliverables from the analytical laboratory with an Excel summary spreadsheet on August 29, 2011
9/2/2011	Submitted validated residential soil sampling data to USEPA			

Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
9/2/2011	Submitted email to Gary Miller and Valmichael Leos requesting clarification on a potential chemical monitoring program for the TCRA armored cap			In order to start the development of a sampling plan for this program, respondents need to know the following from USEPA (1) Is the use of passive SPME acceptable to USEPA for the cap monitoring (2) Will this program be conducted as part of the TCRA AOC or RI/FS UAO program, and (3) Who will be the lead contact from USEPA for development and approval of the TCRA chemical monitoring program
9/7/2011	Submitted a revised memorandum outlining data gap issues identified in the Draft Preliminary Site Characterization Report to reflect changes requested by USEPA		,	,
9/11/2011	Submitted a Draft Fact Sheet for the Site to USEPA for consideration	)		This fact sheet was requested by USEPA
9/15/2011	Submitted Monthly Report No 22			
9/19/2011	Submitted Draft Addendum 1 to the Sediment Sampling and Analysis (SAP) for additional sediment sampling	,	Received letter from Gary Miller providing conditional approval of the SAP	2
9/19/2011	Submitted Draft Addendum 1 to the Tissue Sampling and Analysis Plan (SAP) for additional background catfish and crab sampling	10/3/2011	Received letter from Gary Miller providing conditional approval of the SAP	, , , , , , , , , , , , , , , , , , , ,
9/21/2011	Submitted letter to USEPA regarding ADCP servicing issue and San Jacinto River Fleet Operations	10/19/2011	Received letter from Gary Miller to continue deployment of the acoustic doppler profiler and the re-deployment of the suspended sediment sampler when water is again flowing over the Lake Houston dam	,
9/22/2011	Submitted Attachment B2 (Toxicity of Dioxin-Like Compounds to Invertebrates, Fish, Reptiles, Birds and Mammals) in Appendix B of the Final RI/FS Work Plan			
10/4/2011	Submitted Addendum 1 to the Sediment Sampling and Analysis (SAP) for additional sediment sampling			Addressed conditions outlined in conditional approval letter received on 10/3/2011

Table 1 Summary of Agency Communication

San Jacinto River Waste Pits Superfund Site

Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
10/5/2011	Submitted Addendum 1 to the Tissue Sampling and Analysis Plan (SAP) for additional background catfish and crab sampling	,		Addressed conditions outlined in conditional approval letter received on 10/3/2011
10/12/2011	Submitted Draft Dioxin Treatability Study Literature Review	-		
10/14/2011	Submitted letter to USEPA regarding Field Studies Issues	11/10/2011	Received an email from Gary Miller to David Keith stating that after discussions with partner agencies, the request to remove the ADCP and discontinue data collection for the current velocity and upstream sediment load studies is approved	If a high flow event occurs, or appears likely at any time within the next two months, then the ADCP shall be re-installed and data collection for the current velocity and upstream sediment load studies resumed. Based on the timing of any such high flow event during this time, a request for extension of the submittal date for the Fate and Transport Model Study will be considered to allow sufficient time for inclusion and evaluation of any new velocity and sediment load data
10/17/2011	Submitted Monthly Report No 23			1
		10/19/2011	Received letter from Gary Miller approving change in submittal date for the Chemical Fate and Transport Modeling Study to February 1, 2012	
10/28/2011	Email from Jennifer Sampson with Integral Consulting to Gary Miller requesting approval to include three additional samples with percent fines of 81-5, 82-3, and 83-2 be added to seven other samples from the Addendum 1 to the Sediment Sampling and Analysis (SAP) for analysis of dioxins and furans and organic carbon	11/1/2011	Email approval from Gary Miller to Jennifer Sampson for the analysis of additional samples as requested	
11/15/2011	Submitted Monthly Report No. 24			- ,
11/16/2011	Prepared and submitted a meeting summary for the proposed armored cap monitoring program to USEPA			

Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
		11/16/2011	Received and reviewed draft comments from USEPA on the draft Preliminary Site Characterization Report (PSCR)	2
,	- '	11/23/2011	Received and reviewed revised draft comments from USEPA on the draft PSCR	
		11/29/2011	Received and reviewed a draft letter from USEPA regarding comments and directives for additional sampling on the southern impoundment area on behalf of IP	
11/29/2011	Email from David Keith to Mr Miller forwarding technical literature on the use of sediment traps	-		, , , , , , , , , , , , , , , , , , , ,
		12/1/2011	Received and reviewed a fingerprint analysis on the southern impoundment area from Mr Miller on behalf of IP. The analysis was prepared by Dr. Linda Broach with TCEQ	
12/5/2011	Provided copies of residential soil sampling consent forms to Mr Miller		-	
12/6/2011	Provided Mr Miller a table pairing residential soil sample identification numbers and physical street addresses		,	
-		12/9/2011	Received a letter from Mr Miller providing conditional approval of the PSCR The letter further instructed the Respondents to provide a comment response matrix to USEPA for approval, followed by submittal of the Final PSCR	
,		12/9/2011	Received a letter from Mr. Miller providing final comments and directives for additional sampling in the southern impoundment area on behalf of IP	7

Table 1
Summary of Agency Communication

	ver Waste Pits Superfund Site	_		
Respondents Submittal Date	Respondents Communication Summary	Response from USEPA- \\Date	USEPA Communication Summary	Notes
12/13/2011	Prepared and submitted a meeting summary for the Fate and Transport Modeling Workshop #2 to USEPA	-2)		
12/15/2011	Submitted Monthly Report No 25	_	-	
12/29/2011	On behalf of International Paper, submitted Draft Soil SAP Addendum 3, Draft Sediment SAP Addendum 2, and Draft Groundwater SAP Addendum 1	-		
1/3/2012	Submitted a draft matrix summarizing the Respondents proposed revisions to the PSCR to address USEPA comments received on December 8, 2011	1/5/2012	Received email from Mr Miller approving the proposed revisions to the PSCR	Revisions will be incorporated into the Final PSCR
	-	1/5/2012	Received approval in a phone call from Mr Miller on the conceptual TCRA chemical monitoring approach and was directed to develop a SAP for that program	
1/10/2012	Provided email notification to Mr. Miller that the project database had been updated and posted the project web portal	-		
1/17/2012 `	Submitted Monthly Report No 26	-	,	
1/19/2012	Submitted the Draft Alternatives Memorandum, Draft Toxicological and Epidemiological Studies Memorandum, and Draft Exposure Assessment Memorandum	·		
2/1/2012	Submitted Chemical Fate and Transport Modeling Report on February 1, 2012	,	-	-

Table 1 Summary of Agency Communication San Jacinto River Waste Pits Superfund Site Respondents Respondents Response from USEPA Communication Summary Notes\_ Submittal **USEPA Communication Summary** Date Date -Email from J-Hernandez to Respondents' counsel forwarding draft pre-construction baseline site assessment work plan for San 2/9/2012 Jacinto River Fleet project ("SJRF Draft SAP") -Submitted a letter to USEPA regarding revisions to 2/14/2012 the RI/FS schedule Email from J. Hernandez to Respondents' counsel forwarding copy of USEPA letter to 2/14/2012 San Jacinto River Fleet dated 12/1/2012 Email from J Hernandez to Respondents' counsel regarding deadline for comments on 2/15/2012 the SJRF Draft SAP Submitted Monthly Report No 27 2/15/2012 Submitted Final Preliminary Site Characterization 2/28/2012 Report on February 28,-2012 Received comments from Mr Miller on 1) Draft Addendum 1 to the Groundwater Study Sampling and Analysis Plan for Additional Sampling South of Interstate Highway 10 3/1/2012 2) Draft Addendum 2 to the Sediment Sampling and Analysis Plan for Additional Sampling South of Interstate Highway 10 3) Draft Addendum 3 to the Soil Sampling and Analysis Plan for Additional Sampling

South of Interstate Highway 10

Summary of Agency Communication

	ver Waste Pits Superfund Site		<u> </u>	T
Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
3/8/2012	Submitted à letter to USEPA regarding the Respondents' concerns about the San Jacinto River Fleet operations, and provided comments on the Draft SAP	,		,
3/15/2012	Submitted Draft Baseline Ecological Risk Assessment on March 15, 2012			``
3/15/2012	Submitted Monthly Report No 28			
4/2/2012	Submitted Soil SAP Addendum 3, Sediment SAP Addendum 2, and Groundwater SAP Addendum 1 to USEPA	4/11/2012 	Received approval on the Soil Sampling and Analysis Plan (SAP) Addendum 3, Sediment SAP Addendum 2, and Groundwater SAP Addendum 1 from USEPA by letter and email from Gary Miller	
4/5/2012	Submitted cover letter and Revised Schedule for RI/FS deliverables to USEPA	4/11/2012	Received approval on the Revised RI/FS Schedule from USEPA by email from Gary Miller	
4/16/2012	Submitted Monthly Report No. 29	,	-	
4/16/2012	Submitted Draft Sampling and Analysis Plan (SAP) for the TCRA Cap Porewater Assessment	5/9/2012	Received approval with modifications on the Draft SAP Time Critical Removal Action (TCRA) Cap Porewater Assessment on May 9, 2012	l Family
		4/24/2012	Received comments from Gary Miller on the Draft Exposure Assessment Memorandum (EA) and the Draft Toxicological and Epidemiological Studies (TES) Memorandum	Received clarification on comments regarding the EA and TES Memos from USEPA by email to the Respondents' Project Coordinator on May 10, 2012
		5/1/2012	Email from J Hernandez to Respondents' counsel regarding SJRF Draft SAP currently under USEPA review	
	,	5/8/2012	Received comments from USEPA on the Draft Chemical Fate and Transport Modeling Study	

Table 1 Summary of Agency Communication-San Jacinto River Waste Pits Superfund Site Respondents Respondents Response from USEPA Communication Summary Submittal USEPA Communication Summary Notes Date Date -Submitted Monthly Report No 30 5/15/2012 Emails from J. Hernandez to Respondents' counsel providing comments to the SJRF 5/16/2012 Draft SAP from NOAA, TCEQ, and the Harris County Pollution Control Services Submitted Sampling and Analysis Plan (SAP) for the 5/22/2012 TCRA Cap Porewater Assessment Submitted Final Exposure Assessment Memorandum-5/22/2012 and Final Toxilogical and Epidemiological Studies Memorandum to USEPA Received additional comments from USEPA 6/6/2012 on the Draft Chemical Fate and Transport Modeling Study Received copy of 6/12/2012 correspondence from USEPA to SJRF providing USEPA's 6/12/2012 comments to the SJRF Draft SAP

Received comments from USEPA on the

Draft Baseline Ecological Risk Assessment

Provided USEPA a letter regarding the installation of two additional Performance Reference Compound samplers in the TCRA Cap Porewater Assessment

implementation to provide an intermediate check on equilibrium conditions between the samplers and cap

Provided USEPA a letter and updated RI/FS schedule

6/22/2012

porewater on June 13, 2012

Submitted Monthly Report No 31

on June 15, 2012

6/13/2012

6/15/2012

6/15/2012

	ver Waste Pits Superfund Site	<del>                                    </del>	<del></del>	<del>,                                     </del>
Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
7/10/2012	Provided USEPA a letter outlining a process to resolve comments from USEPA on the draft BERA, and requested the draft final BERA be submitted on August 22, 2012	7/17/2012	Received approval letter from G Miller	
7/16/2012	Submitted Monthly Report No 32	•	1 - ~ <u>~</u>	-, -, -, -, -, -, -, -, -, -, -, -, -, -
7/18/2012	Submitted Draft Final Chemical Fate and Transport - Modeling Study	9/13/2012	Received approval of the Draft Final Chemical Fate & Transport on September 13, 2012, with requirements to address additional comments for the final report in the approval letter	Received clarification on modifications requested by USEPA on the Draft Final Chemical Fate and Transport Modeling Report by email from Gary Miller on September 25, 2012, conducted additional analyses, and prepared and submitted the final report to USEPA on October 11, 2012 Mr. Miller agreed to extending the submittal due date on the Final Fate and Transport Modeling Report to allow time for the Respondents to conduct additional evaluations requested by EPA in the approval letter in a phone call with the Respondents Project Coordinator on October 3, 2012
		8/13/2012	Received comments from USEPA on the Draft Remedial Alternatives Memorandum	-,
8/15/2012	Provided email notification to Mr Miller that the project database had been updated and posted to the project web portal			
8/15/2012	Submitted Monthly Report No 33			,
8/22/2012	Submitted Draft Final Baseline Ecological Risk Assessment	2/26/2013	Received conditional approval of Draft Final Baseline Ecological Risk Assessment	The approval letter provided by USEPA was date stamped February, 7, 2013, however it was not transmitted to the Respondents until February, 26, 2013. The approval letter included comments and directives from USEPA that require additional revisions be made in the final report.

**Summary of Agency Communication** San Jacinto River Waste Pits Superfund Site Respondents Respondents Response from USEPA Submittal Communication Summary **USEPA Communication Summary** Notes Date Date Received approval of the Draft Final Remedial Alternatives Memorandum on Submitted Draft Final Remedial Alternative November 14, 2012, with requirements to 9/11/2012 11/14/2012 Memorandum address additional comments for the report in the approval letter 9/17/2012 Submitted Monthly Report No 34 Received approval letter from G Miller for 10/4/2012 TES Memorandum Received approval letter from G Miller for 10/4/2012 the EA Memorandum Provided email notification to Mr. Miller that the Included validated Armored Cap Porewater 10/4/2012 project database had been updated and posted to the Assessment Data project web portal Submitted the Final Chemical Fate and Transport 10/11/2012 Modeling Report to USEPA 10/15/2012 Submitted Monthly Report No- 35 On behalf of IP, provided USEPA with boring logs on the three South Impoundment monitoring wells, 10/19/2012 water table levels, and well construction information Provided USEPA a draft summary presentation of the armored cap porewater monitoring evaluation and 10/30/2012 results to use in a planned community meeting Provided USEPA a letter confirming that delivery of the draft RI Report and toxi on December 5, 2012 Received email approval from Gary Miller was approved, and providing an updated RI/FS 12/6/2012 11/14/2012 that the November 2012 RI/FS schedule was schedule reflecting that change, and other associated approved as presented changes in the Feasibility Study schedule that were made to maintain the overall project schedule

Table 1

Table 1 Summary of Agency Communication San Jacinto River Waste Pits Superfund Site 😞 🗸 Respondents Respondents Response from USEPA USEPA Communication Summary Submittal **Communication Summary** Notes Date Date Received approval of the Draft Final Remedial Alternatives Memorandum on November 14, 2012, with requirements to 11/14/2012 address additional comments for the report in the approval letter 11/15/2012 -Submitted Monthly Report No 36 Submitted Final Remedial Alternatives Memorandum 12/3/2012 to USEPA \_\_ \_ Submitted Draft Remedial Investigation Report and Draft Baseline Human Health Risk Assessment to USEPA Also submitted five field sampling reports including • Field Sampling Report 2011 - 2012 Sediment Study Received conditional approval of the Draft 12/5/2012 3/25/2013 Field Sampling Report 2011 Tissue Study Baseline Human Health Risk Assessment • Field Sampling Report 2012 Soil Study Field Sampling Report TCRA Cap Porewater Assessment • Field Sampling Report Addendum 1 Groundwater Study 12/17/2012 Submitted Monthly Report No '37 Respondents submitted their comments on the Revised San Jacinto River Fleet Draft Sampling and 1/2/2013 Analysis Plan, via email, to USEPA Submitted Monthly Report No 38 1/15/2013 2/15/2013 Submitted Monthly Report No 39 The approval letter provided by USEPA was date stamped February 7, 2013; however it was not Received conditional approval of the Draft transmitted to the Respondents until February 26, 2/26/2013 Final Baseline Ecological Risk Assessment 2013 The approval letter included comments and

3/15/2013

Submitted Monthly Report No 40

directives from USEPA that require additional

revisions be made in the final report.

Table 1
Summary of Agency Communication

	ver Waste Pits Superfund Site	· · ·		
Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
	,	3/25/2013	Received conditional approval of the Draft Baseline Human Health Risk Assessment (BHHRA) by email on March 25, 2013, . followed by regular mail on March 28, 2013	
3/20/2013	Sent an email to USEPA to obtain clarification on USEPA comments number 4 and 8 on the Draft BERA. Additional email correspondence between the Respondents and USEPA related to these comments occurred on April 10, 2013	- ,		USEPA is currently considering the Respondents latest findings related to these comments
4/1/2013	Respondents submitted a letter to USEPA explaining the nature of the possible delays regarding the November 2012 RI/FS Schedule		(	
	-	4/4/2013	Received conditional approval of the Draft Remedial Investigation (RI) Report by email on April 4, 2013, followed by regular mail on April 8, 2013.	
4/4/2013	On behalf of IP, submitted the Draft Groundwater Sampling and Analysis Plan (SAP) Addendum 2 for additional groundwater investigations in the area south of I-10.	4/23/2013	Received conditional approval of the Groundwater SAP Addendum 2	
4/8/2013 ~	Respondents provided written notice required under Paragraph 92 with respect to possible delays in the performance of certain actions set forth in the approved November 2012 RI/FS Schedule	-	-	
4/10/2013	Sent an email to USEPA to follow up on correspondence related to USEPA comments number 4 and 8 on the Draft BERA			USEPA is currently considering the Respondents latest findings related to these comments
4/10/2013	Sent an email to USEPA to obtain clarification on the USEPA Guidance on the classification of Principal Threat Waste		-	USEPA is currently considering the Respondents inquiry

Table 1 Summary of Agency Communication

San Jacinto River Waste Pits Superfund Site				
Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
4/12/2013	Provided an email to USEPA requesting a meeting be conducted on April 24, 2013 to discuss USEPA comment 38 on the Draft RI Report.	- ^		
4/15/2013	Submitted Monthly Report No. 41	q	-	
4/26/2013	Submitted proposed revised RI/FS schedule to USEPA	5/14/2013	Received email approval of proposed revised RI/FS Schedule from USEPA	
4/29/2013	Submitted Final Groundwater SAP Addendum 2 to the USEPA.	- /		
5/6/2013	Submitted Final Baseline Ecological Risk Assessment to USEPA	,	-	-
5/14/2013	Submitted letter to USEPA providing an evaluation of the potential classification of Principal Threat Waste at the Site	_		
5/15/2013	Submitted Monthly Report No 42	,		J .
5/21/2013	Submitted Final RI Report to USEPA			1
5/22/2013	Sübmitted Final BHHRA Report to USEPA			
6/6/2013	Submitted corrected tables for the Final RI Report to USEPA	:		Included replacement pages for Tables 2-1, 6-1, 6-2, and 6-3.
6/17/2013	Submitted Monthly/Report No. 43.			1
7/12/2013	Submitted proposed revised RI/FS schedule to USEPA	7/30/2013	Received approval of the July 2013 RI/FS schedule in an email from USEPA	5.0
7/15/2013	Provided email notification to Mr. Miller that the updated RI/FS database had been updated and posted to the project web portal	- 、	-	
7/15/2013	Submitted Monthly Report No. 44	,		<i>1</i> 2
8/15/2013	Submitted Monthly Report No '45		1	
8/27/2013	On behalf of International Paper, provided email summary to Mr Miller of validated dioxin and furan data in from groundwater samples collected south of I 10 in July 2013	-		- , ,
8/30/2013	-	12/18/2013	Email from A. Foster forwarding comments from TCEQ, Port of Houston, and Harris County on the Draft FS	\

	er Waste Pits Superfund Site		· · ·	T a
Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
	Provided email notification to Mr. Miller that the	-		1
9/16/2013	updated RI/FS database had been updated and posted	-	-	
7,10,2015	to the project web portal	'	Y	
9/16/2013	Submitted Monthly Report No 46		, ,	2
10/15/2013	Submitted Monthly Report No 47	-	_	
11/15/2013	Submitted Monthly Report No 48		~ ,,,	
	Submitted Draft Remedial Investigation (RI) Report			<u>-</u>
11/21/2013	Addendum November 21, 2013		'	. ,
12/16/2013	Submitted Monthly Report No 49	•		\$ * * * * * * * * * * * * * * * * * * *
	Submitted Field Sampling Report that summarizes			· · · ·
1/14/2014	the field work associated with the latest investigations			_
	conducted in the area south of I-10			
1/15/2014	Submitted Monthly Report No. 50		_	1 .
	,	1/16/2014 -	Respondents' Project Coordinator received comments on the Draft FS from USEPA by email on Thursday, January 16, 2014, and by certified mail on Monday, January 20, 2014	
1/30/2014	Respondents submitted a letter-to G Miller requesting revision to Schedule for Submittal of the Final Interim Feasibility Study.	,		,
		1/31/2014	Email from G Miller to D Keith (Project Coordinator) responding to Anchor QEA's January 30, 2014 letter and granting extention of time for response to USEPA comments on Draft FS to March 6, 2014	
	-	2/4/2014	J. Sampson of Integral received an email from Philip Turner of USEPA requesting additional information on the relative bioavailability adjustment factor used in the risk assessment for the Site.	
		2/10/2014	Respondents! Project Coordinator received amended comments on the Draft FS from USEPA by email, and directing the Respondents to provide the Final Interim FS on or before March 21, 2014	/

Summary of Agency Communication San Jacinto River Waste Pits Superfund Site Respondents Respondents Response from USEPA USEPA Communication Summary Submittal ~ Communication Summary Notes Date Date Integral provided a letter to G Miller of USEPA providing detail on the technical foundation for the 2/10/2014 relative bioavailability adjustment factor on Monday, February 10, 2014 2/17/2014 Submitted Monthly Report No '51. Provided USEPA input on a Draft Fact Sheet for the 3/11/2014 Respondent's requested USEPA consider moving the April 28, 2014 NRRB presentation to the next 3/12/2014 available NRRB meeting in June 2014 Submitted Monthly Report No .52 3/17/2014 Submitted Draft Final Interim Feasibility Study 3/21/2014 Submitted a White Paper supplement to the Draft Submitted hard copies of White Paper with a Final Interim Feasibility Study Report by email to 3/26/2014 transmittal letter on 4/7/2014. Gary Mıller. Received five questions from G. Miller by 4/1/2014 email regarding alternatives in the Draft Final Interim Feasibility Study Report. Submitted a comment/response matrix to USEPA 4/3/2014summarizing responses to comments on the Draft Feasibility Study Report Submitted Monthly Report No. 53. 4/15/2014 Provided an email response to questions received. from Gary Miller by email on April 29, 2014, 4/29/2014 regarding shallow groundwater testing in the area south of Interstate 10 Provided an email response to questions received from Gary Miller by email on March 24, 2014, 5/2/2014 regarding shallow groundwater flow in the area south of Interstate 10 Conducted a conference call and WebEx meeting with Gary Miller, USEPA's Remedial Project 5/5/2014 Manager to review and discuss questions regarding the Draft Final Interim FS contained in an April 2, 2014; email from Mr Miller

Submitted Monthly Report No 54

5/15/2014

Table 1 Summary of Agency Communication San Jacinto River Waste Pits Superfund Site Respondents Respondents Response from USEPA Communication Summary **USEPA Communication Summary** Submittal Notes Date Coordinated with Gary Miller, USEPA's Remedial Project Manager, on questions related to the Draft 6/5/2014 Final Interim FS in a phone call on June 5, 2014 Submitted Monthly Report No. 55. 6/16/2014 Submitted National Remedy Review Board (NRRB) 6/20/2014 materials on behalf of the Respondents. Submitted Monthly Report No 56 7/15/2014 Email from G Miller to D. Keith regarding 7/30/2014 proposed plan schedule announcement 8/15/2014 Submitted Monthly Report No 57. Email from G Miller to D. Keith seeking clarification on residential soil sampling 9/3/2014 Provided email response to G Miller providing Email from G Miller confirming that 9/9/2014 9/9/2014 clarification on residential soil sampling results clanfication was helpful Submitted Monthly Report No 58 9/15/2014 10/15/2014 Submitted Monthly Report No. 59.-Submitted hydrodynamic, sediment transport, and chemical fate and transport modeling files and 10/31/2014 documentation to Dr. Earl Hayter with the U S Army Corps of Engineers (USACE) Participated in a call with Mr Gary Miller and Received an email from Gary Miller Dr. Phillip Turner to discuss the RBA on November 24, 2014 A call with additional 11/14/2014 suggesting a call to discuss the Site Relative technical staff from USEPA and the Respondents Bioavailability Adjustment (RBA) was scheduled for December 16, 2014

11/17/2014

12/15/2014

Submitted Monthly Report No 60 Submitted Monthly Report No. 61.

Table 1 Summary of Agency Communication

San Jacinto River Waste Pits Superfund Site				
Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes
12/16/2014	Respondents hosted a meeting with Gary Miller and Phil Turner of USEPA Region 6, and several representatives of USEPA headquarters and their consultants on December 16, 2014 to discuss site-specific considerations relevant to the Relative Bioavailability Adjustment (RBA) factor used in the RI/FS for the site.	12/17/2014	-, -	Provided USEPA with presentation materials on the Relative Bioavailability Adjustment issue
1/15/2015	Submitted Monthly Report No 62	٠, ,		
1/16/2015	Respondents provided follow up information requested from 12/16/2014 meeting regarding the RBA factor in a letter from D Keith to G Miller		-	- 1 - ,
2/16/2015	Submitted Monthly Report No 63	•		· v
3/16/2015	Submitted Monthly Report No 64.		·	, ~
		4/9/2015	Respondents' project coordinator received an email from Gary Miller with request for clarifications for Paul Schroeder at USACE on modeling assumptions in the Draft Final Interim Feasibility Study	
4/15/2015	Submitted Monthly Report No 65			
4/22/2015	Respondents provided USEPA a summary of modeling assumptions for the Draft Final Interim Feasibility Study.			
4/22/2015	Respondents provided USEPA analytical laboratory results and concentration data for dioxin and furan congeners from surface water sampling locations in the San Jacinto River	4/15/2015	Respondents' project coordinator received an email from Gary Miller with request for analytical laboratory results and concentration data for dioxin and furan congeners from surface water sampling locations in the San Jacinto River	
5/11/2015	Respondents provided USEPA a summary of laboratories utilized during the performance of the RI/FS	5/8/2015	Respondents' project coordinator received an email from Gary Miller with request for listing of laboratories used during the RI/FS	
5/15/2015	Submitted Monthly Report No. 66.	(		
6/15/2015	Submitted Monthly Report No 67			1
7/15/2015	Submitted Monthly Report No 68		<u> </u>	and the second second

Respondents Submittal Date  Response from USEPA Date  Response from USEPA Date  Received an email from G Miller directing Respondents to revise the Final RI/FS Work Plan dated November 2010 or prepare an addendum and submit to the USEPA within 30 days of receipt of the email  Received the Evaluation of the San Jacinto Waste Pits Feasibility Study Remediation Alternatives report prepared by the U.S. Army Corps of Engineers in an email from Carlos Sanchez  8/17/2015  Submitted Monthly Report No 69 In accordance with Section XXII, Paragraph 92 of
Received an email from G Miller directing Respondents to revise the Final RI/FS Work Plan dated November 2010 or prepare an addendum and submit to the USEPA within 30 days of receipt of the email  Received the Evaluation of the San Jacinto Waste Pits Féasibility Study Remediation Alternatives report prepared by the U.S. Army Corps of Engineers in an email from Carlos Sanchez  8/17/2015 Submitted Monthly Report No 69 In accordance with Section XXII, Paragraph 92 of
Received an email from G Miller directing Respondents to revise the Final RI/FS Work Plan dated November 2010 or prepare an addendum and submit to the USEPA within 30 days of receipt of the email  Received the Evaluation of the San Jacinto Waste Pits Feasibility Study Remediation Alternatives report prepared by the U.S. Army Corps of Engineers in an email from Carlos Sanchez  8/17/2015 Submitted Monthly Report No 69 In accordance with Section XXII, Paragraph 92 of
Waste Pits Féasibility Study Remediation 8/10/2015  Alternativés report prepared by the U.S. Army Corps of Engineers in an email from Carlos Sanchez  8/17/2015  Submitted Monthly Report No 69  In accordance with Section XXII, Paragraph 92 of
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In accordance with Section XXII, Paragraph 92 of
the UAO, the Respondents notified USEPA on September 4, 2015, that they will not be able to  9/4/2015 produce sampling and analysis plans (SAPs) for surface water, porewater, sediment, and groundwater within 30 days as directed in Gary Miller's email dated August 6, 2015
9/15/2015 Submitted Monthly Report No. 70.
Provided comments on the Evaluation of the San  Jacinto Waste Pits Feasibility Study Remediation Alternatives report prepared by the U.S. Army Corps of Engineers
Provided USEPA a schedule for completing SAPs for sediment, porewater, groundwater, and surface water.  10/8/2015  The USEPA approved the schedule for submittal of draft plans relating to the future sampling at the San Jacinto River Waste Pits Superfund Site. The porewater and the sediment sampling plans are due by October 23, 2015, and the ground water and surface water sampling plans are due by November 20, 2015. As directed by USEPA, the remaining schedule for the performance of
the work will be considered during completion and approval of the work plans.

Respondents Submittal Date	Respondents Communication Summary	Response from USEPA > Date	USEPA Communication Summary	Notes
10/23/2015	Submitted Draft Addendum 3 to the Sediment Sampling and Analysis Plan.	1/29/2016	Received comments from USEPA on Draft Addendum 3 to the Sediment Sampling and Analysis Plan	
10/23/2015	Submitted Draft Addendum 1 to the Sampling and Analysis Plan TCRA Cap Porewater Assessment	1/12/2016	Received comments from USEPA on the Draft Addendum 1 to the Sampling and Analysis Plan (SAP) TCRA Cap Porewater Assessment	
11/16/2015	Submitted Monthly Report No 72			
11/20/2015	Submitted Draft Addendum 3 to the Groundwater Sampling and Analysis Plan.	2/26/2016	Received comments from USEPA and Agencies on the Draft Addendum 3 to the Groundwater Sampling and Analysis Plan	
11/20/2015	Submitted the Draft Surface Water Sampling and Analysis Plan	2/16/2016	Received comments from USEPA by regular mail on the Draft Surface Water Sampling and Analysis Plan	
12/1/2015	Submitted a Draft updated Fact Sheet for the Site			
12/15/2015	Submitted Monthly Report No '73'		-	
12/21/2015	Submitted a Draft Work Plan for collecting sediment samples from the surface of the armored cap	12/22/2015	USEPA approved components of the work plan related to sediment sampling	Sampling was conducted on 12/23/15
1/15/2016	Submitted Monthly Report No. 74			
2/12/2016	Submitted a revised SAP for porewater that resolves comments received from USEPA on January 12, 2016			
2/12/2016	Submitted a draft report summarizing the results of sediment samples associated with the TCRA armored cap	-		
2/16/2016 - >.	Submitted Monthly Report No 75		-	- ' ' '
2/16/2016	Submitted Final Sampling and Analysis Plan, Addendum 1 TCRA Cap Porewater Assessment	2/23/2016	Received approval for the Final Sampling and Analysis Plan, Addendum 1 TCRA Cap Porewater Assessment	

San Jacinto River Waste Pits Superfund Site					
Respondents Submittal Date	Respondents Communication Summary	Response from USEPA Date	USEPA Communication Summary	Notes	
2/29/2016	Submitted Final Sampling and Analysis Plan, Addendum 3. Sediment Study	3/16/2016	Received approval by email with required modifications for the Final Sampling and Analysis Plan Addendum 3 Sediment Study		
3/4/2016	Participated in a conference call with USEPA to discuss potential fish or shellfish tissue sampling at the Site	. /			
3/15/2016	Submitted Monthly Report No 76		,		
3/17/2016	Prepared and submitted the Final Sampling and Analysis Plan: Surface Water Study to USEPA	3/24/2016	Received approval by email for the Final Sampling and Analysis Plan Surface Water Study.		
3/22/2016	Submitted Final Addendum 3 to the Groundwater Study Sampling and Analysis Plan	3/24/2016	Received approval by email for Draft Addendum 3 to the Groundwater Study Sampling and Analysis Plan		
3/23/2016	Submitted Text Replacement: Final Sampling and Analysis Plan, Addendum 3 Sediment Study	- "		-, , ,	
3/25/2016	Submitted Draft Addendum 2 to the Tissue Sampling and Analysis Plan for Additional Gulf Killifish Tissue Sampling	4/6/2016	Received approval by email for Draft Addendum 2 to the Tissue Sampling and Analysis Plan for Additional Gulf Killifish Tissue Sampling	-	
		4/5/2016	The Respondents' Project Coordinator was notified by USEPA's Remedial Project Manager that USEPA would be finalizing the FS for the Site via phone		
4/15/2016	Submitted Monthly Report No 77		-		
	_	5/9/2016	Received an email from Gary Miller requesting assistance in locating a table from Appendix E of the Baseline Human Health Risk Assessment (BHHRA)	Responded with the table location in the BHHRA on May 11, 2016	
	-	5/10/2016	Received email from Gary Miller requesting support in preparation of USEPA community meeting scheduled for May 25, 2016	Respondent's Project Coordinator followed up with Mr Miller on May 10, 2016 and the Respondents are working on the requested materials	

Table 1 Summary of Agency Communication San Jacinto River Waste Pits Superfund Site Respondents Respondents Response from USEPA USEPA Communication Summary Submittal Communication Summary Notes Date Date -Received email from Gary Miller notifying the Respondents the National Remedy Review Board (NRRB) meeting for the San Jacinto Site is June 15, 2016 Mr Miller 5/11/2016 also indicated any white paper submittals for the NRRB consideration should be provided to USEPA by May 20, 2016 Provided USEPA an updated draft schedule for sediment, tissue, groundwater, porewater and surface 5/12/2016 water sampling and analysis plan implementation

Miller.

5/13/2016

Received email approval of Performance

Reference Compound Procedures from Gary

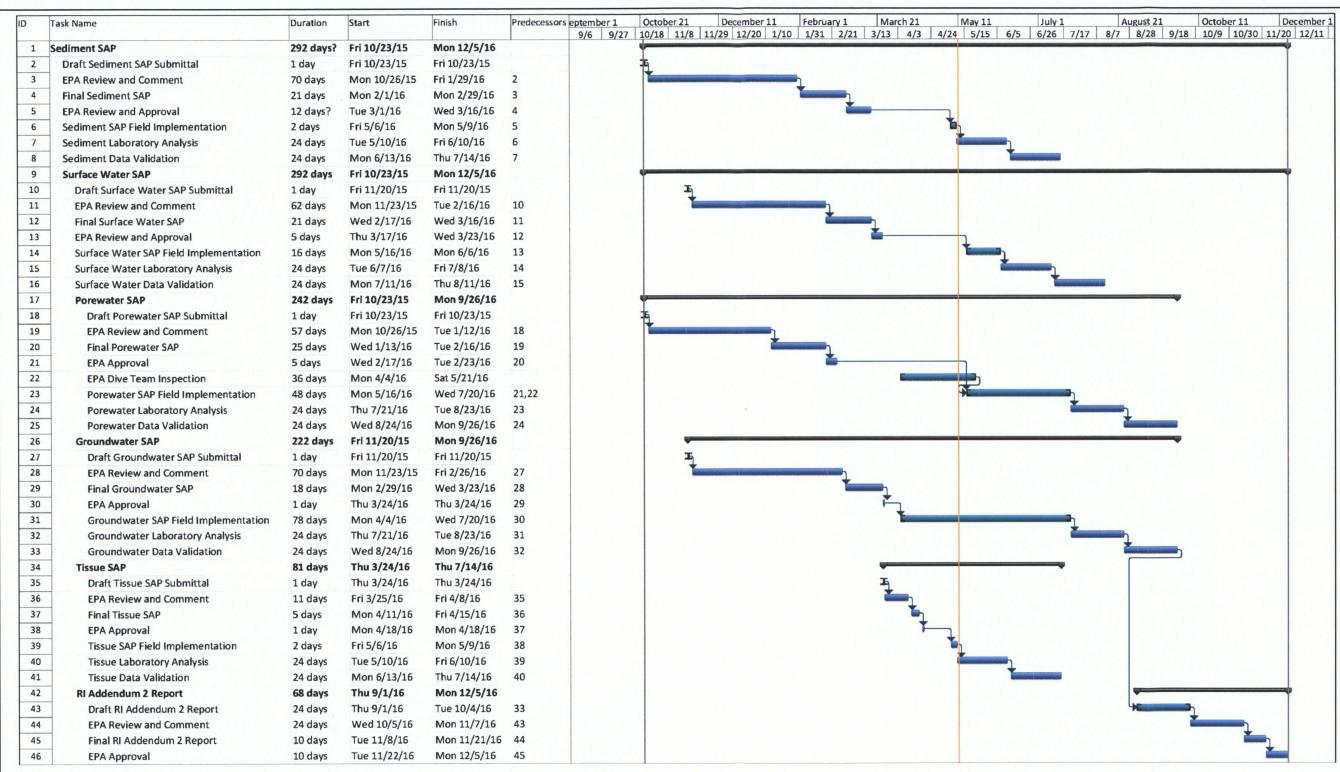
Submitted a memorandum of Performance Reference

groundwater sampling and analysis plans for USEPA

Compound analysis procedures for porewater and

review and approval

5/12/2016



#### Notes

14 Surface Water SAP Field Implementation: May 13. Call Gary Miller to evaluate expected flow conditions in the subsequent three weeks to discuss whether surface water sampling should commence the following Monday. If not, do this each Friday until conditions seem favorable, with deployment to take place as soon as possible.

22 EPA Dive Team Inspection: Final dive team inspection on northwestern area to be conducted by probing from boat at previously identified areas following porewater sampler installation the week of 5/16.

23 Porewater SAP Field Implementation: Field schedule driven by storm events and EPA dive team.

**31 Groundwater SAP Field Implementation:** Original well installation and sampler deployment occurred from April 03 - April 12, 2016. Final Well on Southeastern Berm of Northern Impoundment to be installed week of 5/9/16 after building access into the well location across right-of-way ditch. Added additional time for well samplers to stay deployed to account for final well installation date and equilibration following storm events.

